

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

United States of America,

Plaintiff,

v.

Case No. 20-cr-20124  
Honorable Laurie J. Michelson  
M.J.: Elizabeth A. Stafford

D-1 Erskin Bernard Perryman,  
D-2 Elijah Goodman,

Defendant.

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**FORFEITURE BILL OF PARTICULARS**

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The United States of America, by and through its undersigned counsel, submits this Forfeiture Bill of Particulars pursuant to Federal Rule of Criminal Procedure 7(f), to provide notice of specific property that the government intends to forfeit upon conviction.

The allegations set forth in the First Superseding Indictment, (ECF No. 47), and in the First Superseding Information (ECF No. 66), all are re-alleged and incorporated herein by this reference for the purpose of alleging forfeiture pursuant to Federal Rule of Criminal Procedure 32.2(a).

Property subject to forfeiture to the United States pursuant to 18 U.S.C. §§ 924(d) and 1594, 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), includes, but is not limited to, the following:

1. Smith and Wesson 6 shot .38 caliber Revolver, Ser No: 15K0119;
2. Mossberg 500A, Ser No: K553258, with missing barrel;
3. Llama .45 caliber Semi-Automatic Pistol, Ser No: C35082;
4. Brescia Rigarmi Pistol, 25 caliber, Ser No: 122162, without magazine;
5. Remington Wingmaster Shotgun, Ser No: 1284801V;
6. Sig Trailside .22 caliber Pistol, Ser No: E0043950;
7. Pink iPhone A1661 IC:579C-E3087A;
8. Samsung Phone, SM A102U, Ser No: 356272101346083;
9. Silver iPhone Model A1688;
10. Smith and Wesson M&P Compact 9MM with threaded barrel Serial #DYC8957; and
11. Smith and Wesson M&P Compact 9MM with laser attachment serial #DWZ7798.

This notice does not limit the government from seeking a forfeiture money judgment or the forfeiture of additional specified property.

Respectfully submitted,

MATTHEW SCHNEIDER  
United States Attorney

s/ Michael El-Zein

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Dated: January 26, 2021

**CERTIFICATION OF SERVICE**

I hereby certify that on January 26, 2021, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will electronically serve all ECF participants.

s/ Michael El-Zein  
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